

# Holland & Knight

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December 18, 2024

## **BY ECF**

Hon. John R. Padova  
United States District Court  
for the Eastern District of Pennsylvania  
17613 U.S. Courthouse  
601 Market Street  
Philadelphia, PA 19106

Re: Request for Extension of Time to Respond to Complaint:  
*Weingrad v. Premium Merchant Funding One, LLC*  
Case No: 2:24-cv-06247-JP

Dear Judge Padova,

I represent Defendant Premium Merchant Funding One, LLC (“PMF”) in the above reference matter. I write with the consent of Plaintiff, through counsel, for an extension of PMF’s deadline to file a response to the Complaint filed by Plaintiff in this matter up to, and including, January 13, 2025.

The current response deadline is December 18, 2024. PMF acknowledges, and apologizes for, the lateness of this request. Upon information and belief, PMF had erroneously calendared the response deadline, and my firm was only just retained *this evening* by PMF to represent it in this action. Upon learning of today’s deadline, counsel in our office contacted Plaintiff’s counsel, who responded that Plaintiff does not oppose PMF’s request for an extension.

This request is made to allow PMF’s counsel to review the allegations, prepare a strategy and response, and, if warranted, engage in settlement discussions. There is no scheduling order in place, and therefore, no deadlines will be impacted by this extension.

We thank the Court for its consideration of this request.

Respectfully submitted,

HOLLAND & KNIGHT LLP

/s/ Jonathan M. Marmo  
Jonathan M. Marmo, Esq.